

JD VIRTUAL LTD

Privacy Policy (v1.1)

This privacy policy will explain how our organization uses the personal data we collect from you when you use our website.

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1.) Introduction

We protect your personal data in line with the requirements of the General Data Protection Regulation (GDPR). The GDPR requires data controllers such as ourselves to document our lawful basis for processing personal data. It also gives you rights over how your data is processed. This privacy policy documents the data we collect, why and how we process it, and how to exercise your rights.

2). Data Controller

The data controller responsible for this website is JD Virtual LTD, registered company number 13913750 who can be contacted at Grafton Cottage, Prixford, Barnstaple, Devon, EX31 4DX.

jdvirtual.co.uk contains links to other websites.

This privacy policy only applies to jdvirtual.co.uk and does not cover other services and transactions that we link to. These services have their own terms and conditions and privacy policies.

If you visit another website from ours, ensure you read their privacy policy to find out how they process your information

If you visit www.jdvirtual.co.uk from another website, we may receive information from the other website. We do not use this data. You should read the privacy policy of the website you came from to find out more about this.

If you want to request more information about our privacy policy or information regarding data protection you can contact us using the details provided at the end of this document.

3). Lawful Basis for Processing

For each method by which we collect personal data, this privacy policy documents our lawful basis for processing the data. Where we rely on your consent to process your data, we explain how you can withdraw your consent and delete your data.

If you are an existing contact or customer, we will only contact you by postal and electronic means (e-mail) with information about services or goods which you have previously purchased from us or enquired about. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by post or electronic means only if you have consented to this. You can choose to not receive these types of communication by contacting us.

Why do we need to collect and process your data?

We use data to analyse how clients and consumers interact with our website so that we can improve both the site and our services. This is known as pursuance of legitimate interests and allows us to lawfully collect data and monitor the performance of our contracts. We use your personal data to send you more information about our web design services as requested.

For information, these are the categories of lawful bases for processing:

- **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering a contract.
- **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

4). Disclosures

In addition to any sharing of data described elsewhere in this privacy policy, we may disclose data for legal reasons. If we suspect criminal activity, we may disclose data relating to those involved or affected to the appropriate authorities. We may also be obliged to disclose data if we receive a request from an appropriate authority.

5). Security

The GDPR requires us to implement appropriate technical measures to protect data. We verify the identity of any individual who requests access to data before granting access. We use Transport Layer Security (TLS, also known as SSL) to encrypt any data you supply to us through our website. Additional technical measures are described at the relevant points in this privacy policy.

6). Data Storage

We store your data on secure servers in the European Economic Area (EEA). Some of our suppliers are based outside the EEA (European Economic Area). System Data may be transferred, shared, and processed within our group and to and by these third parties. This may involve the storage, transfer, and processing of this information outside the EEA or the country where you or a user is located. Where this happens, we will ensure that any such transfer or processing is subject to appropriate legal and technical safeguards.

7). Retention Policy

We will process personal data during the duration of any contract and will continue to store only the personal data needed for five years after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

8). Data Collection Rights

Your rights as a data subject. At any point whilst JD Virtual Ltd is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

If JD Virtual Ltd refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

JD Virtual Ltd at your request can confirm what information it holds about you and how it is processed

9). Cookies

Cookies are small pieces of code that are stored by your browser. Each cookie has a name and is associated with a particular site. When your browser sends a request to a site (for example, to download a page, image, or video), the computer that responds (known as a server) may tell your browser to set one or more cookies. When your browser makes further requests to the same site it sends the cookies back to the server. This allows the server to remember you as you browse the site and provide features such as shopping baskets or password-protected areas.

10). Data Collection

10.1). Required Data

10.1.1) jdvirtual.co.uk

This is a required cookie, it is used to store information about previous visits for the purpose of website functionality, it does not store personal information.

No information related to this cookie is viewable by us therefore we do not process any of the data stored within.

10.2). Data Collected When You Contact Us

10.2.1). Contact form

When you submit your details through the contact form on our website, we collect personal data including:

- your name

- telephone number
- email address
- message

Your contact information will be stored in our CRM system for 12 months. This will be automatically deleted if no customer relationship is formed, along with records of any further correspondence. View the HubSpot cookie policy here (<https://legal.hubspot.com/cookie-policy>) And the privacy policy here (<https://legal.hubspot.com/privacy-policy>)

Lawful basis for processing: Performance of a contract

Why? We will use your personal data to send you more information about our web design services as requested.

10.3). Data Collected by Third Parties on our Behalf

10.3.1). HubSpot

HubSpot is the CRM used by Jd virtual, we utilise HubSpot to manage and store customer contact and interaction information. HubSpot collects data on jdvirtual.co.uk directly from the “contact us” form on the contact page. This is detailed above in the “contact forms” section. The HubSpot plugin will also record how many times it has been viewed.

View the HubSpot cookie policy here (<https://legal.hubspot.com/cookie-policy>)
And the privacy policy here (<https://legal.hubspot.com/privacy-policy>)

Legalities: We use data to analyse how clients and consumers interact with our website so that we can improve both the site and our services. This is known as pursuance of legitimate interests and allows us to lawfully collect data and monitor the performance of our contracts

10.3.2). Google Analytics

We use Google Analytics to track visitor interaction with our site to produce statistical reports. Google collects details of the pages you view and the time you viewed them, the features of your browser, and your IP address.

For more information on how Google handles the data it collects, see Google’s privacy policy. (<https://policies.google.com/privacy>)

To opt out of Google Analytics tracking on our site, utilise the privacy preferences section on our website to disable analytics cookies.

Legalities: We use data to analyse how clients and consumers interact with our website so that we can improve both the site and our services. This is known as pursuance of legitimate interests and allows us to lawfully collect data and monitor the performance of our contracts

10.3.3). Microsoft Clarity

We use Microsoft Clarity to track visitor interaction with our site to produce statistical reports. clarity collects details of the pages you view and the time you viewed them, how you interacted with those pages, the features of your browser, and your IP address. It also collects heatmaps allowing us to analyse user interaction on our website.

For more information on how Microsoft clarity handles the data it collects, see the Microsoft Clarity privacy policy here. (<https://docs.microsoft.com/en-us/clarity/cookie-list>)

To opt out of Microsoft Clarity tracking on our site, utilise the privacy preferences section on our website to disable analytics cookies.

Legalities: We use data to analyse how clients and consumers interact with our website so that we can improve both the site and our services. This is known as pursuance of legitimate interests and allows us to lawfully collect data and monitor the performance of our contracts

10.4). Other Data Collected by Third Parties

These are cookies that JD Virtual Ltd does not have the ability to control.

10.4.1) Calendlly

We utilise Calendlly to power our 15-minute consultation section.

View the Calendlly privacy policy here (<https://calendly.com/privacy>)

10.4.2). Webflow.com

Our website is hosted by webflow.io cookies may be embedded by this service to monitor site usage.

For more information see Webflow's cookie policy (<https://webflow.com/legal/cookie-policy>) And Webflow's privacy policy (<https://webflow.com/legal/privacy>)

10.4.3). Stripe

Webflow utilises stripe as a payment processor.

Read their privacy policy here (<https://stripe.com/gb/privacy>) And their cookie policy here (<https://stripe.com/gb/legal/cookies-policy#:~:text=I%20opt%2Dout%3F-Yes,by%20visiting%20those%20sites%20directly.>)

11). Requesting your Information

11.1). You Can Request the Following Information:

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of JD Virtual Ltd or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored, and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

11.2). Identification Required to Access Personal Data

We will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If JD Virtual Ltd is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to joe@jdvirtual.co.uk or by phoning 01271 452183 or writing to us at the address further below.

12). Changes to this Privacy Policy

We may occasionally make changes to this privacy policy. Following any changes, the date at the top of this privacy policy will be updated. If any change allows for wider access to data, such changes will only apply to data collected after the date of the updated privacy policy.

13). Complaints, Information Requests & Contact Details

If you wish to make a complaint about how your personal data is being processed by JD Virtual Ltd or its partners, you have the right to complain to us. If you do not get a response within 30 days, you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Data Protection Officer

JD Virtual LTD
Grafton Cottage,
Prixford
Barnstaple
N Devon

JULY 2022

EX31 4DX

Tel: 01271 452183

Or email joe@jdvirtual.co.uk

Data Protection Regulator

Information Commissioner's office

Wycliffe House,

Water Ln

Wilmslow

SK9 5AF

Tel: 0030 123 1113